

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KNIGHT FIRST AMENDMENT
INSTITUTE AT COLUMBIA
UNIVERSITY,

Plaintiff,

v.

U.S. DEPARTMENT OF STATE

Defendant.

Civil Action No. 1:23-cv-2513 (AKH)

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PROCESSING
SCHEDULE**

At a status conference held on June 14, 2024, the Court ordered the Parties to confer and jointly submit a proposed order setting forth a schedule for the processing and production of records in this Freedom of Information Act (“FOIA”) suit. In response, Plaintiff Knight First Amendment Institute at Columbia University and Defendant U.S. Department of State stipulate as follows:

WHEREAS, on June 14, 2024, the Parties appeared telephonically for a status conference at which they provided an update to the Court on the State Department’s processing of records it has identified as being potentially responsive to Plaintiff’s FOIA request;

WHEREAS, the State Department stated that it is undertaking supplemental searches to identify records of correspondence responsive to Request Nos. 1 and 2, and to confirm the completeness of its collection of call readouts that are potentially responsive to Plaintiff’s Request;

WHEREAS, the State Department stated that, during its re-review of certain documents originally determined to be non-responsive, the agency determined that 97 additional pages are

responsive to Plaintiff's Request, and that it has referred those pages for internal and external consultation to determine whether any information therein is subject to an exemption under FOIA; and

WHEREAS, the Parties have conferred and agree to a schedule for the processing and production of all remaining responsive and non-exempt records;

IT IS NOW HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. By June 21, 2024, the State Department will provide an update to Plaintiff on the status of its supplemental searches with respect to Request Nos. 1 and 2.
2. By June 28, 2024, the State Department will inform Plaintiff whether additional responsive call readouts have been identified in its supplemental searches.
3. By July 5, 2024, the State Department will begin processing any records it identifies as potentially responsive in its supplemental searches. The Parties are still negotiating the processing rate for these records and will submit a joint status report setting out their respective positions if they are unable to come to an agreement.
4. By July 5, 2024, the State Department will finish processing the 97 pages that were determined to be responsive during its re-review, or if any delays by external parties prevent the State Department from meeting this deadline it will advise Plaintiff of the reason for the delay.

The Parties do not believe that a status conference is necessary at this time, and propose submitting a joint status report to the Court on September 20, 2024.

Respectfully submitted,

/s/ Jennifer Jones
Jennifer Jones
Alex Abdo

Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
jennifer.jones@knightcolumbia.org

Counsel for Plaintiff

- and -

DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2748
dominika.tarczynska@usdoj.gov

Counsel for Defendant

June 20, 2024

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. Alvin K. Hellerstein
United States District Judge